

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

ACADIA L. SENESE (CABN 251287)
KATHRYN HAUN (CABN DCBN 484131)
Assistant United States Attorney
450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: acadia.senese@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALE JOSEPH YOUNG,

Defendant.

No. CR 08-0502 MMC

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING PRETRIAL
CONFERENCE

The defendant, GALE JOSEPH YOUNG, represented by Robert Waggener, and the government, represented by Acadia L. Senese, Special Assistant United States Attorney, and Kathryn Haun, Assistant United States Attorney, jointly request that the currently set Pretrial Conference date of October 4, 2011 at 2:00 p.m. be continued to October 11, 2011 at 2:00 p.m..

Both counsel for the government will be out of the Northern District of California the week of October 3rd for training. Ms. Senese spoke with Robert Waggener, and he is unavailable the week of September 26th. Your Honor's courtroom clerk indicated that October 11th is available for the Court for the Pretrial Conference.

1 The parties will submit on all of the Court's prior rulings in this case regarding pretrial
2 motions at the Pretrial Conference. The parties anticipate that the only main outstanding issue
3 before the Court at the Pretrial Conference will be the extent to which defense counsel may
4 impeach the government's additional witness. To that end, both parties are in the process of
5 meeting and conferring about the admissibility of prior convictions for the government's
6 additional witness, and both parties anticipate that there will be a number of stipulations
7 regarding the admissibility of certain prior convictions and/or conduct. To the extent that there is
8 any disagreement between the parties, the parties will raise it with the Court as soon as possible.
9 The government will submit those proposed stipulations to your Honor in advance of the Pretrial
10 Conference.

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12 IT IS SO STIPULATED:

MELINDA HAAG
United States Attorney

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14 DATED: 9/12/11

/s/
ACADIA SENESE
KATHRYN HAUN
Assistant United States Attorneys

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18 DATED: 9/12/11

/s/
ROBERT WAGGENER
Attorney for Gale Joseph Young

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20 IT IS HEREBY ORDERED that the date for the Pretrial Conference be continued to October
21 11, 2011 at ~~2:15 p.m.~~ 3:00 p.m.

22 IT IS SO ORDERED.

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25 DATED: September 13, 2011


THE HON. MAXINE M. CHESNEY
United States District Court Judge